UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

United States Environmental Protection Agency **Office of Pesticide Programs**

Antimicrobials Division (AD)

January 31, 2010

DP BARCODE: 384502

MRID : 482996-01

SUBJECT: AW13
(Name of Product)

REG. NO.: 1258-RGGT

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use [ ] OR End-use Product [x]

INGREDIENTS:

PC Code(s)	CAS Number	Active Ingredient(s):
081405	87-90-1	Tri-chloro-s-triazinetrione

TEST LAB: Registrant

SUBMITTER: Arch Chemicals, Inc.

GUIDELINE: Product Chemistry Group A and B

ORGANIZATION: AD\PSB\CTT

REVIEWER: Earl Goad

APPROVER: Karen P. Hicks

APPROVED DATE: January 31, 2010

COMMENT:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

EPA United States Environmental Protection Agency **Office of Pesticide Programs**

Antimicrobials Division (AD)

January 31, 2010

MEMORANDUM

SUBJECT: Product Chemistry Review for EPA Reg. 1258-RGGT
Product Name:AW13
DP Barcode: 384502

CODE: (A530) Me-Too; New Product; Fast Track

DATE DUE: February 20, 2011

FROM: Earl Goad, Biologist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen Hicks, Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

TO: Wanda Henson (acting) PM#32/Sherri Gray
Regulatory Management Branch II
Antimicrobials Division (7510P)

Applicant: Arch Chemicals, Inc.

PRODUCT FORMULATION FROM LABEL:

PC Codes	Active Ingredient(s):	% by wt.
081405	Tri-chloro-s-triazinetrione	97.3
	Other Ingredient(s):	2.7
	Total:	100.0

BACKGROUND:

Arch Chemicals, Inc. has submitted an application for registration of a new end-use product, AW13. This product is for use as a swimming pool water sanitizer. The product is produced by a non-integrated system. The source of the active ingredient is the [redacted]

The data package included:

1. A letter from the applicant to EPA, dated November 20, 2010.
2. Enforcement Analytical Method ICP-AES for Copper and Aluminum Redox Titration for Trichloroisocyanuric Acid (TCCA) completed December 4, 2001 MRID#: 482996-01.

FINDINGS:

1. The OPPTS 830.1800 (Enforcement Analytical Method) previously was cited from a study assigned MRID 455767-01. That cited document does not contain a complete method description for analysis of this product for the active ingredient. A complete stand alone validated method was requested by the Agency. A different procedure was provided and given MRID#: 482996-01
2. This newly submitted enforcement analytical method document actually provides procedures for analysis of Tri-chloro-s-triazinetrione as well as Copper and Aluminum which are active ingredients in another product. For the purpose of analysis of this product the document provides the steps to quantitate tri-chloro-s-triazinetrione (TCCA) using a standard iodine thiosulfate redox titration method.
3. The titration method is based on the measurement of total available chlorine followed by calculation of the % TCCA in the sample.
4. In spite of the presence or Copper and Aluminum in the other product the method was valid. Since this current product is 97.3% TCCA having minimal impurities that might interfere with the analysis, this method is found to be acceptable.

CONCLUSION:

The enforcement analytical method provided with this submission is found to be acceptable for the purposes of satisfying OPPTS: 830.1800 Enforcement Analytical Method data requirement for registration of this product. The remaining storage stability and corrosion characteristics studies are underway and have yet to be submitted to the Agency.